

Steve Morris, Nevada Bar No. 1543  
Jean-Paul Hendricks, Nevada Bar No. 10079  
MORRIS LAW GROUP  
411 E. Bonneville Ave., Ste. 360  
Las Vegas, Nevada 89101  
Telephone: (702) 474-9400  
[sm@morrislawgroup.com](mailto:sm@morrislawgroup.com)  
[jph@morrislawgroup.com](mailto:jph@morrislawgroup.com)

Victoria E. Brieant (Pro Hac Vice forthcoming)  
LAW OFFICE OF VICTORIA E. BRIEANT, P.A.  
4000 Ponce de Leon Blvd., Ste. 470  
Coral Gables, Florida 33146  
Telephone: (305) 421-7200  
[victoria@brieantlaw.com](mailto:victoria@brieantlaw.com)

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ESTRELLA FRANCHISING CORP.,  
a Florida corporation,

Plaintiff,

v.

AMERICAN ACCESS AGENCY OF  
NEVADA, LLC, a Nevada limited  
liability company, its officer DON  
TURNER, an Individual, and  
AMERICAN ACCESS CASUALTY  
COMPANY, an Illinois corporation,

Defendants.

Case No. 2:18-cv-00433

**STIPULATION TO EXTEND  
DEADLINE TO RESPOND TO  
MOTION FOR PRELIMINARY  
INJUNCTION**

**(THIRD REQUEST)**

Pursuant to LR IA 6-1, plaintiff Estrella Franchising Corp. and  
defendants American Access Agency of Nevada, LLC, Don Turner, and  
American Access Casualty Company (collectively "Defendants") hereby

1 stipulate to extend the deadline to respond to plaintiff's Motion for  
2 Preliminary Injunction. In support of this request, the parties state as  
3 follows:

4           The complaint in this action, ECF No. 4, was filed on March 9,  
5 2018, thereafter plaintiff filed a Motion for Preliminary Injunction, ECF No.  
6 7, on March 12, 2018. On March 19, 2018, counsel for Defendants contacted  
7 counsel for plaintiff and indicated a willingness and desire to settle the  
8 stated claims without litigation. The parties have twice previously agreed to  
9 stipulate to extend the deadline to respond to the Motion for Preliminary  
10 Injunction. The first stipulation was granted by the Court on March 23,  
11 2018, ECF No. 13 and the second stipulation was granted by the Court on  
12 April 18, 2018, ECF No. 17. As a result, the parties have made substantial  
13 progress toward resolving this matter. However, the parties need an  
14 additional two weeks to resolve the remaining open issues and document  
15 their agreement. To that end, the parties stipulate to extend the deadline to  
16 respond to the Motion for Preliminary Injunction an additional two weeks  
17 (14 days) to finalize the settlement terms and prepare the settlement  
18 agreement.

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

The response to the Motion for Preliminary Injunction is currently due April 26, 2018. The reply in support of the motion for preliminary injunction is currently due May 3, 2018. The parties hereby stipulate that the deadline to respond to the Motion for Preliminary Injunction shall be extended to May 10, 2018, and any reply in support of the Motion for Preliminary Injunction shall be due on May 17, 2018. This represents an extension of 14 days, is the third request to extend any deadline in this case, and is made expressly for purposes of settlement.

Dated: April 26, 2018

MORRIS LAW GROUP

By: /s/ Jean-Paul Hendricks  
Steve Morris, Bar No. 1543  
Jean-Paul Hendricks, Bar No. 10079  
411 E. Bonneville Ave., Ste. 360  
Las Vegas, Nevada 89101  
Telephone: (702) 474-9400  
sm@morrislawgroup.com  
jph@morrislawgroup.com

LAW OFFICE OF VICTORIA E.  
BRIEANT  
Victoria E. Brieant (Pro Hac Vice  
forthcoming)  
4000 Ponce de Leon Blvd., #470  
Coral Gables, FL 33146  
Telephone: (305) 421-7200  
victoria@brieantlaw.com

Attorneys for Plaintiff  
Estrella Franchising Corp.

///

///

Dated: April 26, 2018

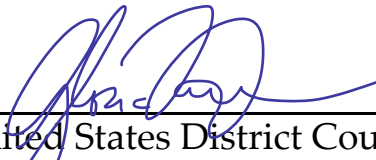
CLINGEN CALLOW & MCCLEAN,  
LLC

By: /s/ Kenneth J. Vanko  
Kenneth J. Vanko  
Illinois Bar No. 6244048  
2300 Cabot Drive, Suite 500  
Lisle, Illinois 60352  
Telephone: (630) 871-2609  
vanko@ccmlawyer.com

Attorney for Defendants  
American Access Agency of  
Nevada, LLC, Don Turner, and  
American Access Casualty  
Company

ORDER

The parties' stipulation, (ECF No. 18), is so  
ordered.

  
United States District Court Judge

DATED: May 4, 2018

Submitted by:

MORRIS LAW GROUP

By: /s/ Jean-Paul Hendricks  
Steve Morris, Bar No. 1543  
Jean-Paul Hendricks, Bar No. 10079  
411 E. Bonneville Ave., Ste. 360  
Las Vegas, Nevada 89101  
Telephone: (702) 474-9400  
sm@morrislawgroup.com  
jph@morrislawgroup.com

Attorneys for Plaintiff  
Estrella Franchising Corp.